
4.0 ALTERNATIVES

4.1 INTRODUCTION

California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a) states that an environmental impact report (EIR) must describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives focuses on those alternatives that are capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines Section 15126.6[b]).

According to the CEQA Guidelines, an EIR need only examine in detail those alternatives that could feasibly meet most of the project objectives. When addressing feasibility, CEQA Guidelines Section 15126.6 states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.” The CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative; however, the alternatives need not be presented in the same level of detail as the assessment of the proposed project.

The CEQA Guidelines indicate that several factors need to be considered in determining the range of alternatives to be analyzed and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the project objectives; and (4) the feasibility of the alternatives. These factors would be unique for each project.

The significant environmental impacts of the project that the alternatives will seek to eliminate or reduce were determined and based on the findings contained in each technical section (Sections 3.1 through 3.14) of this Draft EIR.

In this section, “proposed project” refers to the Stratford School at Partridge Avenue as described in Section 2.0, Project Description.

4.2 ALTERNATIVES UNDER CONSIDERATION

Three alternatives were identified for examination and analysis in this Draft EIR:

- Alternative 1 – No Project Alternative
- Alternative 2 – Reduced Capacity Alternative
- Alternative 3 – Adult School Alternative

These alternatives constitute an adequate range of reasonable alternatives as required under CEQA Guidelines Section 15126.6.

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4.3 ALTERNATIVE 1 – NO PROJECT ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Under this alternative, the project would not be approved and the structures at Raynor Park would not be improved as proposed by Stratford School. There would be no site improvements and park additions like the basketball court would not be implemented. Under the No Project Alternative, the parcel would remain as City surplus property, and thus the City would not meet its General Plan mandate to maximize utilization of the project site. Under Alternative 1, the City may elect to use the existing buildings and rent them out for various uses. These uses would be similar to past uses like daycare and artist studios.

ENVIRONMENTAL ANALYSIS

The following analysis is based on the significant environmental impacts identified in Sections 3.1 through 3.14 of this Draft EIR. Each subsection below presents a brief discussion of Alternative 1's potential impacts on the respective resource area as compared to the proposed project. The analysis is based on a qualitative method and where available, approximate data is presented.

Aesthetics

Under Alternative 1, there would be no change to the project area's aesthetics and visual character. Changes would not occur to the existing structure's exterior, landscaping improvements would not take place, and site amenities would not be added. The project site would retain its visual character as institutional buildings, while the project area would retain its visual character as a residential neighborhood. Although there would be no impacts on aesthetics under Alternative 1, there would also be no improvements to the project area's visual character.

As discussed in Section 3.1, Aesthetics, the proposed project would improve the project site's visual character and would not degrade the project area's visual character or quality. Although improvements would not take place under Alternative 1, the project area would maintain its existing character and Alternative 1 would have no impacts compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.1.1	Adverse Effect on a Scenic Vista	No impact	No impact
3.1.2	Degrade Visual Character or Quality	No impact	Less than significant
3.1.3	Nighttime Light and Increased Overall Lighting and Glare	No impact	Less than significant
3.1.4	Cumulative Impacts to Visual Resources and Aesthetics	No impact	Less than cumulatively considerable

Air Quality

Under Alternative 1, there would be no change to the project site and site improvements would not take place. The project site would not operate as a private school and there would be no construction or school operations at the site. As discussed in Section 3.2, Air Quality, the proposed project would have a less than significant impact with mitigation on air quality due to short-term construction emissions and

would otherwise have a less than significant impact due to operational emissions. As such, Alternative 1 would have fewer impacts on air quality as compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.2.1	Violate Air Quality Standards – Short-Term Construction Emissions	No impact	Less than significant with mitigation
3.2.2	Violate Air Quality Standards – Long-Term Operational Emissions	No impact	Less than significant
3.2.3	Conflict with the Bay Area 2010 Clean Air Plan	No impact	Less than significant
3.2.4	Exposure to Carbon Monoxide Pollutant Concentrations	No impact	Less than significant
3.2.5	Exposure to Toxic Air Contaminants During Construction	No impact	Less than significant
3.2.6	Exposure to Toxic Air Contaminants During Operations	No impact	Less than significant
3.2.7	Creation of Odors	No impact	Less than significant
3.2.8	Cumulatively Considerable Increase in Nonattainment Criteria Pollutants	No impact	Less than cumulatively considerable

Biological Resources

Alternative 1 would not entail any site improvements and no project actions would take place. Vegetation would not be removed and the project site would remain as is with no site disturbance. Alternative 1 would have no impact on biological resources.

As discussed in Section 3.3, Biological Resources of the Draft EIR, the proposed project would impact migratory birds due to tree removal and would require mitigation measure MM 3.3.1 to be implemented. As such, under Alternative 1, there would be fewer impacts on biological resources compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.3.1	Impacts to Candidate, Sensitive, or Special-Status Species	No impact	Less than significant with mitigation
3.3.2	Impacts to Riparian Habitat or Sensitive Natural Communities	No impact	No impact
3.3.3	Impacts to Federally Protected Wetlands	No impact	No impact
3.3.4	Impacts to Wildlife Movement	No impact	No impact
3.3.5	Conflict with Local Policies and Ordinances	No impact	Less than significant
3.3.6	Conflict with Conservation Plans	No impact	No impact
3.3.7	Cumulative Impacts to Special-Status Species	No impact	Less than cumulatively considerable

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Cultural Resources

Under Alternative 1, the project site would remain as is and the existing structures would not be renovated. Similar to the proposed project, Alternative 1 would have no impact on historic resources. Further, there would be no soil disturbance; there would be no potential to impact archeological and paleontological resources and human remains. As discussed in Section 3.4, Cultural Resources, the proposed project could impact archeological and paleontological resources and human remains due to soil disturbance and would require mitigation. As such, Alternative 1 would have fewer impacts to cultural resources compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.4.1	Disturb Historic Resources	No impact	No impact
3.4.2	Disturb Archaeological or Paleontological Resources or Human Remains	No impact	Less than significant with mitigation
3.4.3	Cumulative Impacts on Historic, Cultural, and Paleontological Resources and Human Remains	No impact	Less than cumulatively considerable

Geology and Soils

Alternative 1 would not entail any site improvements and no site disturbance would take place. As such, Alternative 1 would have no impacts on soils and soils erosion. Further, the site would remain unoccupied and people would not be placed in a seismically active zone. As discussed in Section 3.5, Geology and Soils, the proposed project would have a less than significant impact on geology and soils and would not require any mitigation. Under Alternative 1, there would be fewer impacts to geology and soils compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.5.1	Seismic Hazards	No impact	Less than significant
3.5.2	Erosion and Loss of Topsoil	No impact	Less than significant
3.5.3	Development on Unstable or Expansive Soils	No impact	Less than significant
3.5.4	Cumulative Geologic, Seismic, and Soil Hazards	No impact	Less than cumulatively considerable

Greenhouse Gas Emissions

Under Alternative 1, the project site would remain as is and the existing structures would not be renovated. Construction or operation of the site would not take place and greenhouse gases would not be emitted. Alternative 1 would have no impact on greenhouse gas emissions. As discussed in Section 3.6, Greenhouse Gas Emissions, the proposed project would emit approximately 338 metric tons of carbon dioxide equivalents (CO₂e) during construction and 853 metric tons of CO₂e during operations, both under the Bay Area Air Quality Management District (BAAQMD) thresholds of significance. As such, under Alternative 1 there would be fewer impacts to greenhouse gas emissions compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.6.1	Generation of Greenhouse Gas Emissions	No impact	Less than cumulatively considerable
3.6.2	Compliance with Sunnyvale Climate Action Plan	No impact	No impact

Hazards and Hazardous Materials

Under Alternative 1, the structures would not be renovated and no parts of the structure that contain hazardous materials would be removed or remediated. As such, there is potential that hazardous materials could be accidentally released in the environment, potentially harming adjacent residents. Alternative 1 would not include any mitigation measures and would have significant impacts due to accidental release of hazardous materials. Since construction would not take place and soils would not be disturbed, Alternative 1 would have fewer impacts related to potential agricultural contamination than the proposed project. As discussed in Section 3.7, Hazards and Hazardous Materials, the proposed project would have impacts related to release and exposure to hazardous materials and would require mitigation. Nonetheless, the mitigation would help remediate existing site conditions and properly handle asbestos, lead, and other hazardous materials. As such, Alternative 1 would have greater impacts from hazards and hazardous materials compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.7.1	Transportation, Use, and Disposal of Hazardous Materials	No impact	Less than significant
3.7.2	Release and Exposure to Hazardous Materials	Significant	Less than significant with mitigation
3.7.3	Release and Exposure to Hazardous Materials in the Vicinity of a School Site	Significant	Less than significant
3.7.4	Located on a Site Pursuant to Government Code Section 65962.5	No impact	Less than significant
3.7.5	Public and Private Airport Hazards	No impact	No impact
3.7.6	Emergency Response and Evacuation Plans	No impact	Less than significant
3.7.8	Wildland Fire Hazards	No impact	No impact
3.7.9	Cumulative Hazards Impacts	Less than cumulatively considerable	Less than cumulatively considerable

Hydrology and Water Quality

Under Alternative 1, the project site would remain as is and the existing structures would not be renovated. Further, there would be no soil disturbance and no impacts to water quality would take place. Site improvements would not take place and thus the impervious and pervious areas would stay the same. Alternative 1 would have no impacts on hydrology and water quality. As discussed in Section 3.8, Hydrology and Water Quality, the proposed project would create 5,880 square feet of impervious surface on the project site, a 3.7 percent increase, and would have less than significant impacts on hydrology and

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water quality. As such, Alternative 1 would have fewer impacts to hydrology and water quality compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.8.1	Construction and Operational Water Quality Impacts	No impact	Less than significant
3.8.2	Groundwater Recharge	No impact	Less than significant
3.8.3	Alteration of Site Drainage	No impact	Less than significant
3.8.4	Flood Hazards	No impact	Less than significant
3.8.5	Seiche, Tsunami, or Mudflow Hazards	No impact	Less than significant
3.8.6	Cumulative Water Quality Impacts	No impact	Less than cumulatively considerable
3.8.7	Cumulative Flood Hazards	No impact	Less than cumulatively considerable

Land Use

Under Alternative 1, the project site would remain as is and site improvements would not take place. There would be no change to the project site's land use and zoning. As such, Alternative 1 would have no impacts on land use. As described in Section 3.9, Land Use, the proposed project would also no impacts on land use regulation. Therefore, Alternative 1 would have similar impacts to land use compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.9.1	Conflict with Adopted Land Use Plans, Policies, or Regulations	No impact	No impact
3.9.2	Cumulative Land Use Impacts	No impact	Less than cumulatively considerable

Noise

Under Alternative 1, the project site would remain unchanged. There would be no construction on the site and Alternative 1 would have no impacts due to construction noise. The site could be used as an artist studio, a library, or for any other uses preferred by the City, which is congruent with past uses. It is expected that there would be no increase in operational noise under Alternative 1.

As described in Section 3.10, Noise, the proposed project would introduce new noise sources in the project area during construction and during operation. In comparison to existing traffic noise levels, the project would result in a predicted increase in traffic noise levels of approximately 0.2 dBA at the maximum and would increase noise levels during recreational activities and pickup and drop-off operations. Nonetheless, none of the increases would be over the City's established significance thresholds. The proposed project impacts would be less than significant.

Because there would be a slight increase over existing conditions with the proposed project, Alternative 1 would have fewer impacts to noise compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.10.1	Traffic Noise Impacts	No impact	Less than significant
3.10.2	On-Site Operational Noise Source Impacts	No impact	Less than significant
3.10.3	Exposure to Groundborne Vibration	No impact	Less than significant
3.10.4	Exposure to Short-Term Construction Noise	No impact	Less than significant
3.10.5	Cumulative Traffic Noise Impacts	No impact	Less than cumulatively considerable

Public Services

Under Alternative 1, no changes would occur to the site and there would be no increase in the need for law enforcement and fire services. Site improvements, like construction of a basketball court, would not take place and therefore there would be no impacts related to parks. Alternative 1 would have no impacts on public services. As discussed in Section 3.11, Public Services, although the proposed project would lead to an increase in police and fire service demands, such an increase can be accommodated by current levels of service and the proposed project would have a less than significant impact. As such, Alternative 1 would have fewer impacts to public services compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.11.1	Increased Demand for Fire Protection and Emergency Medical Services	No impact	Less than significant
3.11.2	Cumulative Fire Protection and Emergency Medical Services Impacts	No impact	Less than cumulatively considerable
3.11.3	Increased Demand for Law Enforcement Services	No impact	Less than significant
3.11.4	Cumulative Law Enforcement Impacts	No impact	Less than cumulatively considerable
3.11.5	Increased Demand for Parks and Recreation Facilities	No impact	Less than significant
3.11.6	Cumulative Parks and Recreation Demands	No impact	Less than cumulatively considerable

Recreation

Under Alternative 1, the project site would remain as is and would not function as a private school. Alternative 1 would not require a joint use agreement for Raynor Park, and there would be no increase in site usage. There would also be no site improvements, like the basketball court, and impacts associated with such improvements would not take place. Therefore, Alternative 1 would have no impacts on recreational resources.

As discussed in Section 3.12, Recreation, the proposed project would result in increased use of Raynor Park and would include the construction of new recreation facilities. Nonetheless, due to City policies regarding turf management and fees paid by park users for maintenance, this impact would be less than

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significant. Because Alternative 1 would have no impacts on recreation, this would be a lower impact compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.12.1	Substantial Increase in the Use of Recreational Facilities	No impact	Less than significant
3.12.2	Require or Include the Construction of Recreational Facilities	No impact	Less than significant
3.12.3	Cumulative Impacts to Recreation	No impact	Less than cumulatively considerable

Utilities

Under Alternative 1, the project site would remain as is and the existing structures would not be renovated. The structures would be in use intermittently and would potentially require the same amount of water, electrical, or any other utility-related service as when the buildings were previously used for community purposes. Depending on the site occupants, such usage would have to be quantified. As such, it is assumed that Alternative 1 would require utility services over the existing conditions (buildings are not currently occupied) and would have a less than significant impact.

As described in Section 3.13, Utilities, the proposed project would have a total water demand of approximately 12.3 acre-feet per year. This represents approximately 0.05 percent of the city's projected 2035 water demand of 23,731 acre-feet per year and would be considered a negligible increase in demand. Further, the proposed project would generate approximately 9.8 acre-feet per year or 17,813 gallons per day of wastewater and an estimated 520 pounds of solid waste per day or 46.8 tons per year. As such, and because the proposed project would not require the construction of new energy facilities, the proposed project would have a less than significant impact on utilities. It is assumed that Alternative 1 would have less of an impact on utilities than the proposed project since the occupancy of the existing buildings cannot exceed the historic numbers, and utilities were previously provided to the site. As such, under Alternative 1, there would be fewer impacts to utilities compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.13.1	Water Supply Demand and Environmental Effects	Less than significant	Less than significant
3.13.2	Cumulative Water Supply Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.3	Wastewater Discharge Requirements	Less than significant	Less than significant
3.13.4	Cumulative Wastewater Service Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.5	Increased Solid Waste Disposal	Less than significant	Less than significant
3.13.6	Cumulative Solid Waste Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.7	Increased Demand for Electrical, Natural Gas, and Telecommunications Services	Less than significant	Less than significant

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.13.8	Cumulative Demand for Electrical, Natural Gas, and Telecommunications Services	Less than cumulatively considerable	Less than cumulatively considerable

Transportation and Traffic

Alternative 1 would have no impacts on transportation. The project site would remain as is and the existing structures would not be used as a private school. Therefore, there would be no increase in traffic to the project area, nor would there be a need for daytime or shared parking.

As discussed in Section 3.14, Transportation and Traffic, the project would have a significant and unavoidable impact on level of service at the intersection of Lawrence/Benton in the Cumulative Plus Project scenario during the AM peak hours.

As such, under Alternative 1, there would be fewer impacts to transportation and traffic compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.14.1	Conflict with an Applicable Plan, Ordinance, or Policy	No impact	Less than significant with mitigation incorporated
3.14.1	Conflict with an Applicable Congestion Management Program	No impact	Less than significant
3.14.2	Air Traffic Pattern Impacts Under Existing plus Project Conditions	No impact	No impact
3.14.3	Increased Hazards Due to a Design Feature	No impact	Less than significant
3.14.4	Emergency Access Impacts Under Existing plus Project Conditions	No impact	Less than significant
3.14.5	Conflict with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities	No impact	Less than significant with mitigation incorporated
3.14.6	Background Intersection Impacts	No impact	Less than significant
3.14.7	Cumulative Bicycle, Pedestrian, and Transit Impacts	No impact	Less than cumulatively considerable
3.14.8	Cumulative Impacts on Emergency Access and Road Hazards	No impact	Less than cumulatively considerable
3.14.9	Cumulative Impacts at Intersection 3 – Wolfe Road/Elizabeth Way	No impact	Less than cumulatively considerable
3.14.10	Cumulative Impacts at Intersection 11 – Lawrence Expressway/Benton Street AM	No impact	Cumulatively considerable and significant and unavoidable

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Draft EIR Impact Number	Impact Topic	Alternative 1 Impact Significance	Proposed Project Impact Significance
3.14.11	Cumulative Impacts at Intersection 11 –Lawrence Expressway/Benton Street PM	No impact	Less than cumulatively considerable
3.14.12	Cumulative Impacts at Intersection 15 –Homestead Road/Swallow Drive	No impact	Less than cumulatively considerable
3.14.13	Cumulative Impacts at Intersection 16 –Lawrence Expressway/Homestead Road	No impact	Less than cumulatively considerable

4.4 ALTERNATIVE 2 – REDUCED CAPACITY ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Alternative 2 would be similar to the proposed project but would have a 20 percent lower student maximum than the proposed project. The project would be approved for a maximum occupancy of 416 total students. Under Alternative 2, the project would modernize existing buildings to serve a population of approximately 416 students, rather than 520 students under the proposed project. Alternative 2 would include all project site improvements as described in Section 2.0, Project Description, of the Draft EIR, and construction would be the same in scope and duration. In summary, the project under Alternative 2 would include:

- ADA compliance upgrades, as necessary
- Required fire code upgrades, as required
- Seismic evaluation and upgrades, as necessary
- New windows, classroom walls, and exit doors where necessary
- Newly painted surfaces (interior and exterior)
- Upgrades to restrooms, cabinets, counters, plumbing, whiteboards, and any other building needs
- Fencing of entire campus area for safety and security
- Upgrade of existing open space to include a student courtyard
- A new volleyball court
- A new basketball court, located park-side for both school and public use
- Landscaping upgrades throughout the project site
- Addition of on-site circulation driveway

- Addition of an accessible route to the public right-of-way
- Addition of bicycle parking for students
- Sealcoat and striping of all asphalt parking areas

Alternative 2, Reduced Capacity Alternative, was chosen because it would reduce overall project impacts on air quality, greenhouse gas emissions, noise, and recreation. The reduction in impacts is discussed below.

ENVIRONMENTAL ANALYSIS

The following analysis is based on the significant environmental impacts identified in Sections 3.1 through 3.14 of this Draft EIR. Each subsection below presents Alternative 2's potential impacts on the respective resource area and compares it with the proposed project. The analysis is based on a qualitative method and where available, approximate data is presented. For Alternative 2, it is assumed that a 20 percent reduction in student capacity would result in a 20 percent overall reduction of impacts. For example, it is assumed that Alternative 2 would reduce the already less than significant project impacts on operational air quality emissions by 20 percent.

Aesthetics

Under Alternative 2, the project site would be improved and would be used as a private school. Improvements to the project site's aesthetics would take place as described in Section 3.1, Aesthetics. Alternative 2 would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The existing buildings would be renovated to improve their visual appearance and bring them up to current building standards. The overall layout and structure of the buildings would remain unchanged. The project would implement additional improvements, including updating landscaping and resurfacing parking lots, which would generally improve the visual appearance of the project site.

The project site would retain its visual character as school buildings, while the project area would retain its visual character as a residential neighborhood. Alternative 2 would also include the installation of nighttime lighting, and impacts would be similar to the proposed project. Alternative 2 would improve the project site's visual quality and would maintain the project area's visual character. This impact would be less than significant.

As discussed in Section 3.1, Aesthetics, the proposed project would improve the project site's visual quality, would not degrade the project area's visual character or quality, would not substantially impact nighttime, and would have a less than significant impact on aesthetic resources. As such, Alternative 2 would have the same impacts on aesthetic resources compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.1.1	Adverse Effect on a Scenic Vista	No impact	No impact
3.1.2	Degrade Visual Character or Quality	Less than significant	Less than significant
3.1.3	Nighttime Light and Increased	No impact	Less than significant

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	Overall Lighting and Glare		
3.1.4	Cumulative Impacts to Visual Resources and Aesthetics	Less than cumulatively considerable	Less than cumulatively considerable

Air Quality

Under Alternative 2, the project would be implemented and would function as a private school but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. The project would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The project would implement additional improvements, including updating landscaping and resurfacing parking lots. As such, construction emissions under Alternative 2 would match those for the proposed project as shown in **Table 3.2-8** in Section 3.2, Air Quality. As discussed in Section 3.2, Air Quality, and shown in **Table 3.2-8**, the proposed project would have a less than significant impact with mitigation on air quality due to short-term construction emissions. Mitigation measures **MM 3.2.1a** and **MM 3.2.1b** would be required for the proposed project and Alternative 2.

Alternative 2 would reduce the number of students at the project site by 20 percent. Thus, fewer vehicle trips would take place during pickup and drop-off than under the proposed project. Nonetheless, Alternative 2 would entail the operation of the project site as a private school and would increase air quality impacts as compared with existing conditions. It is assumed that air quality operational impacts would experience a 20 percent reduction as compared with the proposed project as shown in **Table 4.0-1** (based on **Table 3.2-9** in Section 3.2, Air Quality).

**TABLE 4.0-1
LONG-TERM OPERATIONAL EMISSIONS**

Source	Emissions					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer Emissions (Pounds per Day)						
Proposed Project	7.52	7.76	36.87	0.07	5.41	1.52
Alternative 2 (20% reduction)	6.01	6.20	29.46	≈ 0.05	4.38	1.21
Winter Emissions (Pounds per Day)						
Proposed Project	7.76	8.60	40.81	0.07	5.41	1.52
Alternative 2 (20% reduction)	6.20	6.88	32.64	≈ 0.05	4.38	1.21
BAAQMD Potentially Significant Impact Threshold (Daily Emissions)	54 pounds/day	54 pounds/day	None	None	82 pounds/day	54 pounds/day
Exceed BAAQMD Daily Threshold?	No	No	No	No	No	No
Annual Emissions (Tons per Year)						
Proposed Project	1	1	5	0	1	0
Alternative 2 (20% reduction)	> 1	> 1	> 5	0	> 1	0
BAAQMD Potentially Significant Impact Threshold (Annual)	10 tons/year	10 tons/year	None	None	15 tons/year	10 tons/year

Source	Emissions					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Emissions)						
Exceed BAAQMD Annual Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2013.2. See **Appendix D** for emission model outputs.

Notes: Emissions projections account for 1,139 average daily vehicle trips (**Appendix H**).

As discussed in Section 3.2, Air Quality, and shown above, the proposed project would have a less than significant impact from construction and operational emissions. Alternative 2 would also result in a similar less than significant impact for construction, however with 20 percent lower operational emissions than the proposed project from the reduction in traffic.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.2.1	Violate Air Quality Standards – Short-Term Construction Emissions	Less than significant with mitigation	Less than significant with mitigation
3.2.2	Violate Air Quality Standards – Long-Term Operational Emissions	Less than significant	Less than significant
3.2.3	Conflict with the Bay Area 2010 Clean Air Plan	Less than significant	Less than significant
3.2.4	Exposure to Carbon Monoxide Pollutant Concentrations	Less than significant	Less than significant
3.2.5	Exposure to Toxic Air Contaminants During Construction	Less than significant	Less than significant
3.2.6	Exposure to Toxic Air Contaminants During Operations	Less than significant	Less than significant
3.2.7	Creation of Odors	Less than significant	Less than significant
3.2.8	Cumulatively Considerable Increase in Nonattainment Criteria Pollutants	Less than cumulatively considerable	Less than cumulatively considerable

Biological Resources

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. The project would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The project would implement additional improvements, including updating landscaping and resurfacing parking lots. Under Alternative 2, the project would entail the same amount of vegetation removal and impacts to protected species. Further, the project would remove the same number of trees as described in **Appendix E**.

Alternative 2 would implement the same landscape plan as the one proposed for the project and described in Section 2.0, Project Description, of the Draft EIR. As discussed in Section 3.3, Biological Resources, the proposed project would impact migratory birds due to tree removal and would require implementation of mitigation measure **MM 3.3.1**. Alternative 2 would also require the implementation of

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mitigation measure **MM 3.3.1** to lessen impacts on migratory birds, similar to the proposed project. Therefore, Alternative 2 would have similar impacts compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.3.1	Impacts to Candidate, Sensitive, or Special-Status Species	Less than significant with mitigation	Less than significant with mitigation
3.3.2	Impacts to Riparian Habitat or Sensitive Natural Communities	No impact	No impact
3.3.3	Impacts to Federally Protected Wetlands	No impact	No impact
3.3.4	Impacts to Wildlife Movement	No impact	No impact
3.3.5	Conflict with Local Policies and Ordinances	Less than significant	Less than significant
3.3.6	Conflict with Conservation Plans	No impact	No impact
3.3.7	Cumulative Impacts to Special-Status Species	Less than cumulatively considerable	Less than cumulatively considerable

Cultural Resources

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. Similar to the proposed project, Alternative 2 would not impact historic resources since the project site structures are not eligible historic properties. Alternative 2 would require the same amount of soils disturbance. Thus, it could disturb archaeological and paleontological resources or human remains and would require mitigation measure **MM 3.4.2**.

As discussed in Section 3.4, Cultural Resources, the proposed project would impact archeological and paleontological resources and human remains due to soil disturbance; impacts would be less than significant with mitigation measure **MM 3.4.2**. The proposed project would not have any impacts on historic resources. As Alternative 2 results in identical site improvements, the alternative would have similar impacts to the proposed project on cultural resources.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.4.1	Disturb Historic Resources	No impact	No impact
3.4.2	Disturb Archaeological or Paleontological Resources or Human Remains	Less than significant with mitigation	Less than significant with mitigation
3.4.3	Cumulative Impacts on Historic, Cultural, and Paleontological Resources and Human Remains	Less than cumulatively considerable	Less than cumulatively considerable

Geology and Soils

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. The project would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The project would

implement additional improvements, including updating landscaping and resurfacing parking lots. As such, the project under Alternative 2 would require soil disturbance activities; soil erosion would take place similar to the proposed project. Alternative 2 would also result in the exposure of people to dangers associated with earthquakes. Similar to the proposed project, the proposed seismic upgrades in accordance with applicable building standards would minimize these dangers.

As discussed in Section 3.5, Geology and Soils, the proposed project would have a less than significant impact on geology and soils and would not require any mitigation. As such, Alternative 2 would have similar impacts compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.5.1	Seismic Hazards	Less than significant	Less than significant
3.5.2	Erosion and Loss of Topsoil	Less than significant	Less than significant
3.5.3	Development on Unstable or Expansive Soils	Less than significant	Less than significant
3.5.4	Cumulative Geologic, Seismic, and Soil Hazards	Less than cumulatively considerable	Less than cumulatively considerable

Greenhouse Gas Emissions

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, but the lower number of students would entail less pickup and drop-off than the proposed project.

As discussed in Section 3.6, Greenhouse Gas Emissions, the proposed project would emit approximately 338 metric tons of CO₂e during construction and 853 metric tons of CO₂e during operations, both under the BAAQMD thresholds of significance. Assuming a 20 percent reduction in greenhouse gas emissions, Alternative 2 would emit approximately 270.4 metric tons of CO₂e during construction and 682.4 metric tons of CO₂e during operations, both also under the BAAQMD thresholds of significance. Therefore, Alternative 2 would have a less than cumulatively considerable impact on greenhouse gas emissions. Although impacts would be similar in significance overall, Alternative 2 would have fewer impacts compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.6.1	Generation of Greenhouse Gas Emissions	Less than cumulatively considerable	Less than cumulatively considerable
3.6.2	Compliance with Sunnyvale Climate Action Plan	No impact	No impact

Hazards and Hazardous Materials

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0,

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Project Description, similar to the proposed project. The project would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The project would implement additional improvements, including updating landscaping and resurfacing parking lots. Alternative 2 would disturb asbestos-containing materials, lead-based paints, and potentially contaminated soils. As such, mitigation measures **MM 3.7.2a**, **MM 3.7.2b**, **MM 3.7.2c**, **MM 3.7.2d**, and **MM 3.7.2e** would be required, similar to the proposed project.

As discussed in Section 3.7, Hazards and Hazardous Materials, the proposed project would have impacts related to the release and exposure to hazardous materials and would require mitigation measures **MM 3.7.2a**, **MM 3.7.2b**, **MM 3.7.2c**, **MM 3.7.2d**, and **MM 3.7.2e**. Nonetheless, the mitigation would help remediate existing site conditions and properly handle asbestos, lead, and other hazardous materials, and the project would have a less than significant impact.

Therefore, Alternative 2 would have the same impacts related to hazards and hazardous materials as the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.7.1	Transportation, Use, and Disposal of Hazardous Materials	Less than significant	Less than significant
3.7.2	Release and Exposure to Hazardous Materials	Less than significant with mitigation	Less than significant with mitigation
3.7.3	Release and Exposure to Hazardous Materials in the Vicinity of a School Site	Less than significant	Less than significant
3.7.4	Located on a Site Pursuant to Government Code Section 65962.5	Less than significant	Less than significant
3.7.5	Public and Private Airport Hazards	No impact	No impact
3.7.6	Emergency Response and Evacuation Plans	Less than significant	Less than significant
3.7.8	Wildland Fire Hazards	No impact	No impact
3.7.9	Cumulative Hazards Impacts	Less than cumulatively considerable	Less than cumulatively considerable

Hydrology and Water Quality

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. The project would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The project would implement additional improvements, including updating landscaping and resurfacing parking lots. Alternative 2 would require impervious surface to be installed for the new driveway and basketball court. It would match the proposed project's impervious surface amount of 5,800 square feet. All state and City regulations as they relate to hydrology and water quality would be implemented under Alternative 2 and impacts would be less than significant.

As discussed in Section 3.8, Hydrology and Water Quality, the proposed project would create 5,800 square feet of impervious surface on the project site, with a 3.7 percent increase, and would have less than significant impacts on hydrology and water quality due to implementation of current state and City regulations.

As such, Alternative 2 would have the same impacts to hydrology and water quality compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.8.1	Construction and Operational Water Quality Impacts	Less than significant	Less than significant
3.8.2	Groundwater Recharge	Less than significant	Less than significant
3.8.3	Alteration of Site Drainage	Less than significant	Less than significant
3.8.4	Flood Hazards	Less than significant	Less than significant
3.8.5	Seiche, Tsunami, or Mudflow Hazards	Less than significant	Less than significant
3.8.6	Cumulative Water Quality Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.8.7	Cumulative Flood Hazards	Less than cumulatively considerable	Less than cumulatively considerable

Land Use

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, and the project site would be used as a private school. The project site would continue to be used in accordance with its General Plan designation and would require the approval of a conditional use permit, similar to the proposed project. Alternative 2 would have no impacts on adopted land use plans, policies, or regulations. As described in Section 3.9, Land Use, the proposed project would have no impacts on land use regulations.

As such, Alternative 2 would have similar impacts compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.9.1	Conflict with Adopted Land Use Plans, Policies, or Regulations	No impact	No impact
3.9.2	Cumulative Land Use Impacts	Less than cumulatively considerable	Less than cumulatively considerable

Noise

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. The project would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The project would implement additional improvements, including updating landscaping and resurfacing parking lots.

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Alternative 2 would require a joint use agreement and Stratford School would use Raynor Park during recess and for physical activities. Under Alternative 2, the project would emit the same amount of noise during construction and would abide by City regulations regarding construction time and duration. As such, impacts due to construction noise would be less than significant.

Alternative 2 would make use of the adjacent park and noise levels would increase as compared to existing conditions. Although Alternative 2 would have 20 percent fewer students, noise impacts would be similar for recreational activities to the proposed project since activities would be similar. Alternative 2 would result in 20 percent fewer drop-offs and pickups and would result in an increase of approximately 0.16 dBA at the maximum, a negligible decrease compared to the proposed project.

As described in Section 3.10, Noise, the proposed project would introduce new noise sources in the project area during construction and during operation. In comparison to existing traffic noise levels, the project would result in a predicted increase in traffic noise levels of approximately 0.2 dBA at the maximum and would increase noise levels during recreational activities and pickup and drop-off operations. Nonetheless, none of the increases would be over the City's established significance thresholds and the proposed project impacts would be less than significant. Because Alternative 2 would have a decrease in operational noise impacts, it would have fewer impacts on noise compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.10.1	Traffic Noise Impacts	Less than significant	Less than significant
3.10.2	On-Site Operational Noise Source Impacts	Less than significant	Less than significant
3.10.3	Exposure to Groundborne Vibration	Less than significant	Less than significant
3.10.4	Exposure to Short-Term Construction Noise	Less than significant	Less than significant
3.10.5	Cumulative Traffic Noise Impacts	Less than cumulatively considerable	Less than cumulatively considerable

Public Services

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, and an increase law and fire services would be needed. At the same time, proposed park improvements would be implemented and the same impacts as those outlined in the Draft EIR would take place. Although fewer students would be accommodated at the project site, police and fire services would be needed to serve the project site. As such, Alternative 2 would have a less than significant impact on fire and police services, similar to the proposed project.

As discussed in Section 3.11, Public Services, although the proposed project would lead to an increase in police and fire service demands, such an increase can be accommodated by current levels of service and the proposed project would have a less than significant impact. Since Alternative 2 would require the same increase in services, it would have the same impacts on public services as the proposed project.

Draft EIR	Impact Topic	Alternative 2	Proposed Project
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Impact Number		Impact Significance	Impact Significance
3.11.1	Increased Demand for Fire Protection and Emergency Medical Services	Less than significant	Less than significant
3.11.2	Cumulative Fire Protection and Emergency Medical Services Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.11.3	Increased Demand for Law Enforcement Services	Less than significant	Less than significant
3.11.4	Cumulative Law Enforcement Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.11.5	Increased Demand for Parks and Recreation Facilities	Less than significant	Less than significant
3.11.6	Cumulative Parks and Recreation Demands	Less than cumulatively considerable	Less than cumulatively considerable

Recreation

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, including a new basketball court. The project under Alternative 2 would also implement the joint use agreement as outlined in Section 3.12, Recreation, and similar wear and tear on Raynor Park would take place. Because there would be 20 percent fewer students than with the proposed project, turf deterioration would take place at a slower rate. The decrease in rate of deterioration would be negligible and all City policies would be implemented for facility maintenance, similar to the proposed project. As such, the project under Alternative 2 would have a less than significant impact on recreational resources.

As discussed in Section 3.12, Recreation, the proposed project would result in increased wear and tear to Raynor Park and would include the construction of recreation facilities. Nonetheless, due to City policies regarding turf management, park use, and mitigation measures included in the Draft EIR, this impact would be less than significant. Because wear and tear would occur at a slower rate than with the proposed project, Alternative 2, would have incrementally fewer impacts on recreation compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.12.1	Substantial Increase in the Use of Recreational Facilities	Less than significant	Less than significant
3.12.2	Require or Include the Construction of Recreational Facilities	Less than significant	Less than significant
3.12.3	Cumulative Impacts to Recreation	Less than cumulatively considerable	Less than cumulatively considerable

Utilities

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. Alternative 2 would require less water and would

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discharge less wastewater than the proposed project due to fewer students. Based on a 20 percent reduction rate, Alternative 2 would have a total water demand of approximately 9.84 acre-feet per year, a negligible increase in demand compared with City of Sunnyvale usage rates and projected needs. Alternative 2 would generate approximately 7.84 acre-feet per year of wastewater and 416 pounds of solid waste per day. This reflects a 20 percent reduction in water demand and waste generation.

It is expected that Alternative 2 would require a similar amount of energy to the proposed project since all of the same structures would be in use. The increase in utility needs would be negligible. Alternative 2 would have a less than significant impact on utilities.

As described in Section 3.13, Utilities, the proposed project would have a total water demand of approximately 12.3 acre-feet per year. This represents approximately 0.05 percent of the city's projected 2035 water demand of 23,731 acre-feet per year and would be considered a negligible increase in demand. Further, the proposed project would generate approximately 9.8 acre-feet per year or 17,813 gallons per day of wastewater and an estimated 520 pounds of solid waste per day or 46.8 tons per year. As such, and because the proposed project would not require the construction of new energy facilities, the proposed project would have a less than significant impact on utilities.

Because Alternative 2 would have less utility need compared to the proposed project, it would have lower impacts on utilities.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.13.1	Water Supply Demand and Environmental Effects	Less than significant	Less than significant
3.13.2	Cumulative Water Supply Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.3	Wastewater Discharge Requirements	Less than significant	Less than significant
3.13.4	Cumulative Wastewater Service Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.5	Increased Solid Waste Disposal	Less than significant	Less than significant
3.13.6	Cumulative Solid Waste Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.7	Increased Demand for Electrical, Natural Gas, and Telecommunications Services	Less than significant	Less than significant
3.13.8	Cumulative Demand for Electrical, Natural Gas, and Telecommunications Services	Less than cumulatively considerable	Less than cumulatively considerable

Transportation and Traffic

Under Alternative 2, the project would be implemented similar to the proposed project but would accommodate fewer students. All project site improvements would take place as described in Section 2.0, Project Description, similar to the proposed project. The project would renovate the existing buildings and construct new features including a circulation drive, fencing, and sports courts. The project would implement additional improvements, including updating landscaping and resurfacing parking lots.

Alternative 2 would result in a significant impact at Intersection 11 – Lawrence Expressway/Benton Street in the AM peak hour in the Cumulative Plus Project scenario similar to the proposed project, which could be mitigated to a less than significant impact through implementation of a mitigation measure. The mitigation measure would require the installation of a second eastbound left turn lane on Benton at Lawrence. Such installation would require the elimination of a landscaped median with several trees, which would result in a more challenging pedestrian environment. The addition of the left turn lane would lessen the impact to a less than cumulatively considerable level. Nonetheless, Alternative 2, similar to the proposed project, would still not meet the guidelines for the addition of a second left turn lane per HCM standards, and as such the second left turn lane would most likely not be implemented. Because the second left turn lane would not be implemented unless a rule exception would be requested, Alternative 2 impacts at Intersection 11 AM level of service would remain significant and unavoidable.

Overall, Alternative 2 would lower impacts on transportation and traffic system compared with the proposed project, but would not eliminate the significant and unavoidable impact associated with the Lawrence/Benton intersection.

Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.14.1	Conflict with an Applicable Plan, Ordinance, or Policy	Less than significant with mitigation incorporated	Less than significant with mitigation incorporated
3.14.1	Conflict with an Applicable Congestion Management Program	Less than significant	Less than significant
3.14.2	Air Traffic Pattern Impacts Under Existing plus Project Conditions	No impact	No impact
3.14.3	Increased Hazards Due to a Design Feature	Less than significant	Less than significant
3.14.4	Emergency Access Impacts Under Existing plus Project Conditions	Less than significant	Less than significant
3.14.5	Conflict with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities	Less than significant with mitigation incorporated	Less than significant with mitigation incorporated
3.14.6	Background Intersection Impacts	Less than significant	Less than significant
3.14.7	Cumulative Bicycle, Pedestrian, and Transit Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.14.8	Cumulative Impacts on Emergency Access and Road Hazards	Less than cumulatively considerable	Less than cumulatively considerable

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Draft EIR Impact Number	Impact Topic	Alternative 2 Impact Significance	Proposed Project Impact Significance
3.14.9	Cumulative Impacts at Intersection 3 – Wolfe Road/Elizabeth Way	Less than cumulatively considerable	Less than cumulatively considerable
3.14.10	Cumulative Impacts at Intersection 11 – Lawrence Expressway/Benton Street AM	Cumulatively considerable and significant and unavoidable	Cumulatively considerable and significant and unavoidable
3.14.11	Cumulative Impacts at Intersection 11 –Lawrence Expressway/Benton Street PM	Less than cumulatively considerable	Less than cumulatively considerable
3.14.12	Cumulative Impacts at Intersection 15 –Homestead Road/Swallow Drive	Less than cumulatively considerable	Less than cumulatively considerable
3.14.13	Cumulative Impacts at Intersection 16 –Lawrence Expressway/Homestead Road	Less than cumulatively considerable	Less than cumulatively considerable

4.5 ALTERNATIVE 3 – ADULT SCHOOL ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Alternative 3 looks at the impacts of operating the existing project site as an adult school. The adult school would be modeled on the Santa Clara Unified School District adult schools, which offers a combination of the following programs: Diploma, Enrichment Courses, Health and Fitness, Parenting and Careers, and Computers. Student enrollment would be capped at 200 students. Typical of adult schools, most offerings would take place in the evening to accommodate an adult student population. Looking at comparable schools in Santa Clara County, evening course offerings typically start between 6:30 p.m. and 7:30 p.m., while recreational classes, like cooking or fitness, take place on weekend mornings or evenings.

Typically adult school attendees drive to class and park during classes. For a 200-student population, approximately 100 parking spaces would be necessary to accommodate school operations.¹ There are currently 91 parking spots available on the project site; as such, there would be an unmet need of 9 parking spots. The Filipino United Church of Christ is located to the west of the project site and through a use agreement, the unmet need of 9 parking spaces could be accommodated. The parking use agreement would be negotiated by the school operator along with the City.

Under Alternative 3, the project would modernize existing buildings to serve a population of approximately 200 adult school students, rather than the 520 middle school students under the proposed project. Alternative 3 would include project site improvements as described in Section 2.0, Project Description, of the Draft EIR as they pertain to the existing structures as follows:

- ADA compliance upgrades, as necessary

¹ Calculations based on City of Sunnyvale Requirements for Higher Learning Educational facilities of 0.5 parking spaces per student. See: <http://sunnyvale.ca.gov/Portals/0/Sunnyvale/CDD/Non-Residential/Multifamily%20Non-Residential%20Parking%20-%20FINAL.pdf>

- Required fire code upgrades, as required
- Seismic evaluation and upgrades, as necessary
- New windows, classroom walls, and exit doors where necessary
- Newly painted surfaces (interior and exterior)
- Upgrades to restrooms, cabinets, counters, plumbing, whiteboards, and any other building needs
- Fencing of entire campus area for safety and security
- Upgrade of existing open space to include a student courtyard
- Landscaping upgrades throughout the project site
- Addition of bicycle parking for students
- Sealcoat and striping of all asphalt parking areas

Alternative 3 was selected to minimize recreational impacts to adjacent Raynor Park, which were of concern to the surrounding community. Alternative 3 would not include the addition of volleyball and basketball courts nor the addition of a circulation driveway. Alternative 3 would also not require a joint use agreement between the City and the Stratford School at Partridge Avenue for use of Raynor Park as described in Section 2.0, Project Description, of the Draft EIR. As such, it is expected that under Alternative 3 there would be no impacts to recreational resources as discussed below.

ENVIRONMENTAL ANALYSIS

The following analysis is based on the significant environmental impacts identified in Sections 3.1 through 3.14 of this Draft EIR. Each subsection presents a brief discussion of Alternative 3's potential impacts on the respective resource area and compares it with the proposed project. The analysis is based on a qualitative method and where available, approximate data is presented. For Alternative 3, it is assumed that a more than 50 percent reduction in student capacity would result in an approximately 50 percent overall reduction of impacts. For example, it is assumed that Alternative 3 would have a 50 percent reduction in car trips since adult students typically drive themselves, while school children typically require pickups and drop-offs.

Aesthetics

Under Alternative 3, the project site would be improved and would be used as an adult school. Improvements to the project site's aesthetics would take place as described in Section 3.1, Aesthetics. Alternative 3 would renovate the existing buildings to improve their visual appearance and bring them up to current building standards. The overall layout and structure of the buildings would remain unchanged. The project would implement additional improvements, including updating landscaping and resurfacing parking lots, which would generally improve the visual appearance of the project site. Alternative 3 would not require the installation of a new circulation driveway, volleyball court, or basketball court. As such, none of the impacts associated with these features would take place.

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The project site would retain its visual character as school buildings, while the project area would retain its visual character as a residential neighborhood. Alternative 3 would also include the installation of nighttime lighting and impacts would be similar to the proposed project. Alternative 3 would improve the project site's visual quality and would maintain the project area's visual character. This impact would be less than significant.

As discussed in Section 3.1, Aesthetics, the proposed project would improve the project site's visual quality, would not degrade the project area's visual character or quality, would not substantially impact nighttime, and would have a less than significant impact on aesthetic resources. As such, Alternative 3 would have the same impacts on aesthetic resources compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.1.1	Adverse Effect on a Scenic Vista	No impact	No impact
3.1.2	Degrade Visual Character or Quality	Less than significant	Less than significant
3.1.3	Nighttime Light and Increased Overall Lighting and Glare	No impact	No impact
3.1.4	Cumulative Impacts to Visual Resources and Aesthetics	Less than cumulatively considerable	Less than cumulatively considerable

Air Quality

Under Alternative 3, the project would be implemented and would function as an adult school accommodating a maximum of 200 students, approximately 50 percent fewer than the proposed project. Project site improvements would take place as described in Section 2.0, Project Description, but would not include the basketball and volleyball courts and the circulation elements. The project would implement additional improvements, including updating landscaping and resurfacing parking lots. Although Alternative 3 would not include park improvements, it would still potentially impact air quality during construction, due to restriping of parking lots and building improvements. As such, construction emissions under Alternative 3 would be fewer than those for the proposed project as shown in **Table 3.2-8** in Section 3.2, Air Quality. As discussed in Section 3.2, Air Quality, and shown in **Table 3.2-8**, the proposed project would have a less than significant impact with mitigation on air quality due to short-term construction emissions. Mitigation measures **MM 3.2.1a** and **MM 3.2.1b** would be required for the proposed project and Alternative 3 because construction would require the operation of vehicles that have the potential to impact air quality.

Alternative 3 would reduce the number of students at the project site by approximately 50 percent. Thus, fewer trips would take place than under the proposed project. The adult school is expected to have fewer overall vehicle trips than the proposed project. Because the operational air quality impacts associated with the project are associated with vehicle trips, it is assumed that a reduction in the number of trips would result in a reduction in operational air quality impacts. While it would be speculative to determine the exact reduction in vehicle trips, the lower number of students and different driving patterns suggest that there would be fewer overall vehicle trips than with the proposed project. The reduction in vehicle trips would result in a reduction in operational air quality impacts when compared to the proposed project. An approximation of potential reduction is presented in **Table 4.0-2** (based on **Table 3.2-9** in Section 3.2, Air Quality).

**TABLE 4.0-2
LONG-TERM OPERATIONAL EMISSIONS**

Source	Emissions					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer Emissions (Pounds per Day)						
Proposed Project	7.52	7.76	36.87	0.07	5.41	1.52
Alternative 3 (50% reduction)	3.76	3.8	18.43	≈ 0.03	2.70	0.76
Winter Emissions (Pounds per Day)						
Proposed Project	7.76	8.60	40.81	0.07	5.41	1.52
Alternative 3 (50% reduction)	3.8	4.3	20.40	≈ 0.03	2.70	0.76
BAAQMD Potentially Significant Impact Threshold (Daily Emissions)	54 pounds/day	54 pounds/day	None	None	82 pounds/day	54 pounds/day
Exceed BAAQMD Daily Threshold?	No	No	No	No	No	No
Annual Emissions (Tons per Year)						
Proposed Project	1	1	5	0	1	0
Alternative 3 (50% reduction)	> 1	> 1	> 5	0	> 1	0
BAAQMD Potentially Significant Impact Threshold (Annual Emissions)	10 tons/year	10 tons/year	None	None	15 tons/year	10 tons/year
Exceed BAAQMD Annual Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2013.2. See **Appendix D** for emission model outputs.

Notes: Emissions projections account for 1,139 average daily vehicle trips (**Appendix H**).

As discussed in Section 3.2, Air Quality, and shown above, the proposed project would have a less than significant impact due to operation emissions. Alternative 3 would have a similar less than significant impact.

Therefore, Alternative 3 would have similar impacts on air quality from construction and fewer impacts from operations compared with the proposed project, although both result in less than significant impact.

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Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.2.1	Violate Air Quality Standards – Short-Term Construction Emissions	Less than significant with mitigation	Less than significant with mitigation
3.2.2	Violate Air Quality Standards – Long-Term Operational Emissions	Less than significant	Less than significant
3.2.3	Conflict with the Bay Area 2010 Clean Air Plan	Less than significant	Less than significant
3.2.4	Exposure to Carbon Monoxide Pollutant Concentrations	Less than significant	Less than significant
3.2.5	Exposure to Toxic Air Contaminants During Construction	Less than significant	Less than significant
3.2.6	Exposure to Toxic Air Contaminants During Operations	Less than significant	Less than significant
3.2.7	Creation of Odors	Less than significant	Less than significant
3.2.8	Cumulatively Considerable Increase in Nonattainment Criteria Pollutants	Less than cumulatively considerable	Less than cumulatively considerable

Biological Resources

Under Alternative 3, the project would be implemented similar to the proposed project but would accommodate an adult school with fewer students. The project would renovate the existing buildings, update landscaping, and resurface parking lots. Although less vegetation removal would be necessary, trees may still be removed under Alternative 3 and impacts on migratory birds could take place. As with the proposed project, Alternative 3 would be required to comply with mitigation measure **MM 3.3.1** that would reduce impacts to less than significant.

As discussed in Section 3.3. Biological Resources, the proposed project would impact migratory birds due to tree removal and would require mitigation measure **MM 3.3.1**. Because Alternative 3 would also require mitigation measure **MM 3.3.1**, it would have similar impacts on biological resources compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.3.1	Impacts to Candidate, Sensitive, or Special-Status Species	Less than significant with mitigation	Less than significant with mitigation
3.3.2	Impacts to Riparian Habitat or Sensitive Natural Communities	No impact	No impact
3.3.3	Impacts to Federally Protected Wetlands	No impact	No impact
3.3.4	Impacts to Wildlife Movement	No impact	No impact
3.3.5	Conflict with Local Policies and Ordinances	Less than significant	Less than significant
3.3.6	Conflict with Conservation Plans	No impact	No impact
3.3.7	Cumulative Impacts to Special-Status Species	Less than cumulatively considerable	Less than cumulatively considerable

Cultural Resources

Under Alternative 3, the project would be implemented similar to the proposed project, but would not require as much soil disturbance as the proposed project. Similar to the proposed project, Alternative 3 would not impact historic resources since the project site structures are not eligible historic properties. Alternative 3 would require disturbance of soils; thus, it could disturb archaeological and paleontological resources or human remains and would require mitigation measure **MM 3.4.2**.

As discussed in Section 3.4, Cultural Resources, the proposed project could impact archeological and paleontological resources and human remains due to soil disturbance and would require mitigation measure **MM 3.4.2**. The proposed project would not have any impacts on historic resources. Alternative 3 would have similar construction impacts and would require compliance with the same mitigation measure as the proposed project. For cultural resources, the impact of Alternative 3 is similar to that of the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.4.1	Disturb Historic Resources	No impact	No impact
3.4.2	Disturb Archaeological or Paleontological Resources or Human Remains	Less than significant with mitigation	Less than significant with mitigation
3.4.3	Cumulative Impacts on Historic, Cultural, and Paleontological Resources and Human Remains	Less than cumulatively considerable	Less than cumulatively considerable

Geology and Soils

Under Alternative 3, the project would be implemented to accommodate an adult school. The project would renovate the existing buildings, update landscaping, and resurface parking lots. As such, the project under Alternative 3 would require soil disturbance activities and soil erosion would take place similar to the proposed project, although on a lower scale. Alternative 3 would also result in the exposure of people to dangers associated with earthquakes. Similar to the proposed project, the proposed seismic upgrades in accordance with applicable building standards would minimize these dangers. Alternative 3 would have a less than significant impact on geology and soils.

As discussed in Section 3.5, Geology and Soils, the proposed project would have a less than significant impact on geology and soils and would not require any mitigation. As such, Alternative 3 would have similar impacts compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.5.1	Seismic Hazards	Less than significant	Less than significant
3.5.2	Erosion and Loss of Topsoil	Less than significant	Less than significant
3.5.3	Development on Unstable or Expansive Soils	Less than significant	Less than significant
3.5.4	Cumulative Geologic, Seismic, and Soil Hazards	Less than cumulatively considerable	Less than cumulatively considerable

4.0 ALTERNATIVES

Greenhouse Gas Emissions

Under Alternative 3, the project would be implemented similar to the proposed project, but would accommodate an adult school with a 200-student cap on the student population. Project site improvements would take place as described in Section 2.0, Project Description, with the exception of a new circulation driveway. However, the student population would not require any drop-offs or pickups.

As discussed in Section 3.6, Greenhouse Gas Emissions, the proposed project would emit approximately 338 metric tons of CO₂e during construction and 853 metric tons of CO₂e during operations, both under the BAAQMD thresholds of significance. Assuming a 50 percent reduction in greenhouse gas emissions, Alternative 3 would emit approximately 169 metric tons of CO₂e during construction and 426.5 metric tons of CO₂e during operations, both under the BAAQMD thresholds of significance. Therefore, Alternative 3 would have a less than cumulatively considerable impact on greenhouse gas emissions. Although impacts would be similar in significance overall, Alternative 3 would have fewer impacts on greenhouse gas emissions compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.6.1	Generation of Greenhouse Gas Emissions	Less than cumulatively considerable	Less than cumulatively considerable
3.6.2	Compliance with Sunnyvale Climate Action Plan	No impact	No impact

Hazards and Hazardous Materials

Under Alternative 3, the project would renovate the existing buildings, update landscaping, and resurface parking lots. Alternative 3 would disturb asbestos-containing materials, lead-based paints, and potentially contaminated soils. As such, mitigation measures **MM 3.7.2a**, **MM 3.7.2b**, **MM 3.7.2c**, **MM 3.7.2d**, and **MM 3.7.2e** would be required, similar to the proposed project.

As discussed in Section 3.7, Hazards and Hazardous Materials, the proposed project would have impacts related to the release and exposure to hazardous materials and would require mitigation measures **MM 3.7.2a**, **MM 3.7.2b**, **MM 3.7.2c**, **MM 3.7.2d**, and **MM 3.7.2e**. Nonetheless, the mitigation would help remediate existing site conditions and properly handle asbestos, lead, and other hazardous materials, and the project would have a less than significant impact.

Therefore, Alternative 3 would have the same impacts related to hazards and hazardous materials as the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.7.1	Transportation, Use, and Disposal of Hazardous Materials	Less than significant	Less than significant
3.7.2	Release and Exposure to Hazardous Materials	Less than significant with mitigation	Less than significant with mitigation
3.7.3	Release and Exposure to Hazardous Materials in the Vicinity of a School Site	Less than significant	Less than significant

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.7.4	Located on a Site Pursuant to Government Code Section 65962.5	Less than significant	Less than significant
3.7.5	Public and Private Airport Hazards	No impact	No impact
3.7.6	Emergency Response and Evacuation Plans	Less than significant	Less than significant
3.7.8	Wildland Fire Hazards	No impact	No impact
3.7.9	Cumulative Hazards Impacts	Less than cumulatively considerable	Less than cumulatively considerable

Hydrology and Water Quality

Under Alternative 3, the project would renovate the existing buildings, update landscaping, and resurface parking lots. Alternative 3 would not require impervious surface to be installed for the new driveway and basketball court like the proposed project; therefore, there would be no increase in the amount of impervious surfaces. During construction, Alternative 3 would implement all pertinent state and City regulations. Although there would be no increase in impervious surfaces, the project would disturb soils and require landscaping. Such impacts would be less than significant.

As discussed in Section 3.8, Hydrology and Water Quality, the proposed project would create 5,800 square feet of impervious surface on the project site, with a 3.7 percent increase, and would have less than significant impacts on hydrology and water quality due to implementation of current state and City regulations.

As such, Alternative 3 would have fewer impacts to hydrology and water quality compared with the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.8.1	Construction and Operational Water Quality Impacts	Less than significant	Less than significant
3.8.2	Groundwater Recharge	Less than significant	Less than significant
3.8.3	Alteration of Site Drainage	Less than significant	Less than significant
3.8.4	Flood Hazards	Less than significant	Less than significant
3.8.5	Seiche, Tsunami, or Mudflow Hazards	Less than significant	Less than significant
3.8.6	Cumulative Water Quality Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.8.7	Cumulative Flood Hazards	Less than cumulatively considerable	Less than cumulatively considerable

Land Use

Under Alternative 3, the project would be implemented to accommodate an adult school. The project site would continue to be used in accordance with its General Plan designation as a school and would require the approval of a conditional use permit, similar to the proposed project. Alternative 3 would have no

4.0 ALTERNATIVES

impacts on adopted land use plans, policies, or regulations. As described in Section 3.9, Land Use, the proposed project would have no impacts on land use regulations.

As such, Alternative 3 would have similar impacts on land use compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.9.1	Conflict with Adopted Land Use Plans, Policies, or Regulations	No impact	No impact
3.9.2	Cumulative Land Use Impacts	Less than cumulatively considerable	Less than cumulatively considerable

Noise

Under Alternative 3, the project would be implemented to accommodate an adult school. The project would renovate the existing buildings, update landscaping, and resurface parking lots. Under Alternative 3, the project would emit the same amount of noise during construction and would abide by City regulations regarding construction time and duration. As such, impacts due to construction noise would be less than significant, similar to the proposed project.

Alternative 3 would not require a joint use agreement to use Raynor Park during recess and for physical activities; as such, noise would not increase in Raynor Park during school hours. Under Alternative 3, the project would not entail any drop-offs and pickups, and there would be no noise associated with such activities. Typically adult school students drive to the site and park during their classes. As such, there would be an increase in vehicular noise at the project area during the peak class hours of 6:30 p.m. to 7:30 p.m. As discussed in Section 3.10, Noise, combined peak-hour noise levels generated by pickup/drop-off activities would generate noise levels of approximately 43 dBA L_{eq} at the nearest residence and would not exceed the City's daytime noise standard of 60 dB. The opening and shutting of car doors under Alternative 3 would generate the same level of noise, although at a lower volume in terms of the number of cars. Further, since the class start time in the evening could be anywhere between 6:30 p.m. and 7:30 p.m., such noise would be staggered. Since the student cap would be 200 students, the overall noise would be lower than the proposed project's 520 students. As such, it is assumed that the project under Alternative 3 would have lower operational noise impacts.

As described in Section 3.10, Noise, the proposed project would introduce new noise sources in the project area during construction and during operation. In comparison to existing traffic noise levels, the project would result in a predicted increase in traffic noise levels of approximately 0.2 dBA at the maximum. The proposed project would also increase noise levels during recreational activities and pickup and drop-off operations. Nonetheless, none of the increases would be over the City's established significance thresholds and the proposed project impacts would be less than significant.

Because Alternative 3 would have a slight decrease in operational noise impacts, it would have fewer impacts on noise compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.10.1	Traffic Noise Impacts	Less than significant	Less than significant
3.10.2	On-Site Operational Noise Source Impacts	Less than significant	Less than significant
3.10.3	Exposure to Groundborne Vibration	Less than significant	Less than significant
3.10.4	Exposure to Short-Term Construction Noise	Less than significant	Less than significant
3.10.5	Cumulative Traffic Noise Impacts	Less than cumulatively considerable	Less than cumulatively considerable

Public Services

Under Alternative 3, the project would be implemented to accommodate an adult school with 200 students. Alternative 3 would improve the existing structures, update landscaping, and resurface the existing parking lots. Although a lower number of students would be accommodated at the project site, police and fire services would be needed to serve the project site. As such, Alternative 3 would have a less than significant impact on fire and police services, similar to the proposed project. Alternative 3 would not require any park and recreation facilities, as there would be no basketball and volleyball, and would have no impact on park and recreational facilities.

As discussed in Section 3.11, Public Services, although the proposed project would lead to an increase in police and fire service demands, such an increase can be accommodated by current levels of service and the proposed project would have a less than significant impact. Since Alternative 3 would require the same increase in services, it would have the same impacts as the proposed project on law and fire services and fewer impacts on park services.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.11.1	Increased Demand for Fire Protection and Emergency Medical Services	Less than significant	Less than significant
3.11.2	Cumulative Fire Protection and Emergency Medical Services Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.11.3	Increased Demand for Law Enforcement Services	Less than significant	Less than significant
3.11.4	Cumulative Law Enforcement Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.11.5	Increased Demand for Parks and Recreation Facilities	No impact	Less than significant
3.11.6	Cumulative Parks and Recreation Demands	No impact	Less than cumulatively considerable

Recreation

Under Alternative 3, the project would be implemented to accommodate an adult school with a cap of 200 students. The project under Alternative 3 would not implement the joint use agreement as outlined in

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Section 3.12, Recreation, and wear and tear on Raynor Park would not take place. Alternative 3 would not include a basketball court and there would be no impacts to recreational resources.

As discussed in Section 3.12, Recreation, the proposed project would result in increased wear and tear to Raynor Park and would include the construction of recreation facilities. Nonetheless, due to City policies regarding turf management, fees paid by park users for maintenance, and mitigation measures included in the Draft EIR, this impact would be less than significant. Because there would be no impacts on recreational resources from Alternative 3, it would have fewer impacts on recreation compared to the proposed project.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.12.1	Substantial Increase in the Use of Recreational Facilities	No impact	Less than significant
3.12.2	Require or Include the Construction of Recreational Facilities	No impact	Less than significant
3.12.3	Cumulative Impacts to Recreation	No impact	Less than cumulatively considerable

Utilities

Under Alternative 3, the project would be implemented to accommodate an adult school with a 200-student population. The project would update the existing buildings, landscaping, and parking lots. Alternative 3 would require a lower amount of water supply and would discharge a lower amount of wastewater than the proposed project due to the lower number of students. Based on 200 students, Alternative 3 would have a total water demand of approximately 6.15 acre-feet per year, less than the proposed project. Alternative 3 would generate approximately 4.9 acre-feet per year of wastewater and 260 pounds of solid waste per day.

It is expected that Alternative 3 would require a similar amount of energy to the proposed project since all structures would be in use. The increase in utility needs would be negligible and Alternative 3 would have a less than significant impact on utilities.

As described in Section 3.13, Utilities, the proposed project would have a total water demand of approximately 12.3 acre-feet per year. This represents approximately 0.05 percent of the city's projected 2035 water demand of 23,731 acre-feet per year. Further, the proposed project would generate approximately 9.8 acre-feet per year or 17,813 gallons per day of wastewater and an estimated 520 pounds of solid waste per day or 46.8 tons per year. As such, and because the proposed project would not require the construction of new energy facilities, the proposed project would have a less than significant impact on utilities.

Because Alternative 3 would have a small decrease in utility needs compared to the proposed project, it would have lower impacts on utilities.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.13.1	Water Supply Demand and Environmental Effects	Less than significant	Less than significant

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.13.2	Cumulative Water Supply Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.3	Wastewater Discharge Requirements	Less than significant	Less than significant
3.13.4	Cumulative Wastewater Service Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.5	Increased Solid Waste Disposal	Less than significant	Less than significant
3.13.6	Cumulative Solid Waste Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.13.7	Increased Demand for Electrical, Natural Gas, and Telecommunications Services	Less than significant	Less than significant
3.13.8	Cumulative Demand for Electrical, Natural Gas, and Telecommunications Services	Less than cumulatively considerable	Less than cumulatively considerable

Transportation and Traffic

Under Alternative 3, the project would be implemented to accommodate an adult school with a 200-student cap. The project would renovate the existing buildings, update landscaping, and resurface parking lots.

The adult school students would be expected to drive to and from the facility in contrast to the middle school students who require parents to drop them off and pick them up. The adult school would serve only 200 students, while the proposed project allows up to 520 students. Because both types of students could carpool or take other forms of public or private transportation, it is speculative to determine the exact amount of trip reduction. However, it is reasonable to assume that the adult school would generate fewer overall vehicle trips than the proposed project.

The proposed project would generate trips during the AM peak hour as the normal middle school day starts during this time frame. The adult school would be expected to have a later start, and possibly evening classes, catering to adults who have jobs and would be on their way to and from work during the AM and PM peak hours. There is potential that Alternative 3 would generate a higher number of PM peak-hour trips than the proposed project since classes typically start between 6:30 p.m. and 7:30 p.m., which could increase impacts during PM peak hours when traffic is generally heavier. A later start time of 7:00 p.m. or 7:30 p.m. would lower impacts, while an earlier start time of 5:30 p.m. or 6:00 p.m. could increase impacts.

Because of the fewer students and different transportation characteristics, Alternative 3 can be expected to have less of an impact on circulation than the proposed project on AM peak-hour trips. It is also expected that Alternative 3 would have a similar significant and unavoidable impact on PM peak-hour trips, due to the later start time of classes.

Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.14.1	Conflict with an Applicable Plan, Ordinance, or Policy	Less than significant with mitigation incorporated	Less than significant with mitigation incorporated

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Draft EIR Impact Number	Impact Topic	Alternative 3 Impact Significance	Proposed Project Impact Significance
3.14.1	Conflict with an Applicable Congestion Management Program	Less than significant	Less than significant
3.14.2	Air Traffic Pattern Impacts Under Existing plus Project Conditions	No impact	No impact
3.14.3	Increased Hazards Due to a Design Feature	Less than significant	Less than significant
3.14.4	Emergency Access Impacts Under Existing plus Project Conditions	Less than significant	Less than significant
3.14.5	Conflict with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities	Less than significant with mitigation incorporated	Less than significant with mitigation incorporated
3.14.6	Background Intersection Impacts	Less than significant	Less than significant
3.14.7	Cumulative Bicycle, Pedestrian, and Transit Impacts	Less than cumulatively considerable	Less than cumulatively considerable
3.14.8	Cumulative Impacts on Emergency Access and Road Hazards	Less than cumulatively considerable	Less than cumulatively considerable
3.14.9	Cumulative Impacts at Intersection 3 – Wolfe Road/Elizabeth Way	Less than cumulatively considerable	Less than cumulatively considerable
3.14.10	Cumulative Impacts at Intersection 11 – Lawrence Expressway/Benton Street AM	Less than cumulatively considerable	Cumulatively considerable and significant and unavoidable
3.14.11	Cumulative Impacts at Intersection 11 –Lawrence Expressway/Benton Street PM	Cumulatively considerable and significant and unavoidable	Less than cumulatively considerable
3.14.12	Cumulative Impacts at Intersection 15 –Homestead Road/Swallow Drive	Less than cumulatively considerable	Less than cumulatively considerable
3.14.13	Cumulative Impacts at Intersection 16 –Lawrence Expressway/Homestead Road	Less than cumulatively considerable	Less than cumulatively considerable

4.6 COMPARISON OF ALTERNATIVES/ ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 4.0-3 provides a summary of the potential impacts of the alternatives evaluated in this section, as compared with the project's impacts. Pursuant to CEQA Guidelines Section 15126.6(e)(2), an environmentally superior alternative must be identified from among the other alternatives if the "no project" alternative would otherwise be the environmentally superior alternative. The environmentally superior alternative is the alternative that would result in the fewest or least significant environmental impacts. As described above, under the no project alternative there could be significant impacts on hazards and hazardous materials due to lack of mitigation measures for removal of asbestos- and lead-contaminated materials. Therefore, while the project's significant and unavoidable impacts would be

avoided under the No Project Alternative, since there would be no increase in traffic levels, significant environmental impacts could occur due to lack of hazardous materials mitigation.

Alternative 2 would result in fewer environmental impacts than the proposed project and meets all project objectives. It is assumed Alternative 2, the reduced capacity alternative, would reduce impacts related to air quality, greenhouse gas emissions, noise, recreation and transportation and traffic by 20 percent, even though under the proposed project, the impacts are less-than-significant. While this alternative does not appear capable of reducing the proposed project's only significant and unavoidable impact, Impact 3.14-10, it would marginally reduce the severity of the impacts referenced above, and therefore it would be considered the environmentally superior alternative.

Alternative 3 would result in fewer environmental impacts and would meet the proposed project's objectives. As previously discussed, because of the later start time, Alternative 3 would avoid the proposed project's significant and unavoidable impacts on AM peak-hour cumulative scenarios. Nonetheless, Alternative 3 would potentially have a significant and unavoidable on PM peak-hour traffic due to the later start time (impact 3.14.11). Alternative 3 would not meet project objective number 4 of enhancing the City's recreational opportunities since it would not add a basketball court. It would enhance the City's educational opportunities by adding an adult school. Alternative 3 would not be the environmentally superior alternative because it does not meet all project objectives and it would not avoid the proposed project's significant and unavoidable impacts.

TABLE 4.0-3
SUMMARY COMPARISON OF PROJECT OBJECTIVES

Project Objective	Proposed Project	Alternative 1 No Project	Alternative 2 Reduced Capacity	Alternative 3 Adult School
1. Update and reuse the existing buildings to create attractive facilities in the community	✓	X	✓	✓
2. Implement design measures that minimize impacts on the existing buildings	✓	X	✓	✓
3. Preserve healthy trees on-site to the maximum extent feasible	✓	✓	✓	✓
4. Enhance the city's recreational and educational opportunities	✓	X	✓	X

✓ Meets project objectives

X Does not meet project objective

4.0 ALTERNATIVES

TABLE 4.0-4
SUMMARY COMPARISON OF ALTERNATIVES

Resource Category	Proposed Project	Alternative 1 No Project	Alternative 2 Reduced Capacity	Alternative 3 Adult School
Aesthetics	LTS	NI	LTS	LTS (-)
Air Quality	LTS	NI	LTS (-)	LTS (-)
Biological Resources	LTSM	NI	LTSM	LTSM (-)
Cultural Resources	LTS	NI	LTS	LTS (-)
Geology and Soils	LTS	NI	LTS	LTS (-)
Greenhouse Gas Emissions	LTSM	NI	LTS (-)	LTS (-)
Hazards and Hazardous Materials	LTSM	PS	LTSM	LTSM
Hydrology and Water Quality	LTS	NI	LTS	LTS (-)
Land Use and Planning	NI	NI	NI	NI
Noise and Vibration	LTS	NI	LTS (-)	LTS (-)
Public Services	LTS	LTS	LTS	LTS
Recreation	LTS	NI	LTS (-)	LTS (-)
Utilities	LTS	LTS	LTS (-)	LTS (-)
Transportation and Traffic	SU	NI	SU (-)	SU

Notes:

SU: Significant Unavoidable Impacts with Mitigation

PS: Potentially Significant

LTSM: Less Than Significant with Mitigation

LTS: Less Than Significant

NI: No Impact

(+) Level of impact is more severe than the proposed project.

(-) Level of impact is less severe than the proposed project.

4.7 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

The following possible alternatives were raised during the scoping process. They were rejected as infeasible for the reasons listed below.

Open Space Alternative

This alternative would demolish the existing buildings and expand the open space. All existing structures and landscaping would be removed and the project site would become part of Raynor Park. The City could opt to transform the project site into sports or picnic facilities. This alternative would have construction impacts, as it would entail the complete demolition of the existing structures. Demolition would have impacts related to hazards and hazardous materials due to the age of the structures and the potential for hazardous materials to be present. The demolition alternative would not meet the project objectives. This alternative is not discussed further in this section.

Lease Buildings Alternative

This alternative was suggested in comments on the Notice of Preparation and during the Draft EIR scoping meeting. This alternative would entail leasing the existing structures as opposed to selling them. Under this alternative, Stratford School would operate the Stratford School at Partridge Avenue under similar conditions as the proposed project but would not own the land. This alternative does not fulfill the CEQA requirement for alternatives. The method of ownership would not avoid or substantially lessen any of the project's significant environmental impacts, as the project would continue to be implemented as described in this Draft EIR. Further, the sale of the project site is not part of the CEQA environmental scope, because leasing versus selling the buildings is not an environmental factor studied in this Draft EIR. This alternative was found to not be a feasible CEQA alternative and is not discussed further in this section.

Project without Joint Use Agreement Alternative

This alternative was suggested in comments on the Notice of Preparation. The proposed project would be constructed as described in Section 2.0, Project Description, of the Draft EIR but would not include a joint use agreement. Stratford School would not have guaranteed use privileges of Raynor Park and would not be able to use the park during its recess times or for physical education activities. The proposed project is dependent on park use; this alternative renders the project infeasible. As such, this alternative is not discussed further in this section.

5.0 OTHER CEQA ANALYSIS

This section discusses significant unavoidable impacts, growth inducing impacts and significant irreversible changes associated with the project.

5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires an environmental impact report (EIR) to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, CEQA Guidelines Section 15093(a) allows the decision-making agency to determine whether the benefits of a project outweigh its unavoidable adverse environmental impacts. The City can approve a project with unavoidable adverse impacts if it prepares a Statement of Overriding Considerations setting forth the specific reasons for making such a judgment.

The following impacts of the project, which have been recognized as significant and unavoidable in either the project or cumulative context, are specifically identified in Section 3.14, Transportation and Traffic, of this Draft EIR. All other impacts have been identified as either no impact, less than significant, or less than significant with mitigation

Impacts to Roadway Segment Under Existing Plus Project Conditions at Intersection 11 Lawrence Expressway/Benson Avenue AM Peak Hour

Impact 3.14.10 During the AM peak hour, the addition of project traffic would exacerbate unacceptable LOS F operations at the intersection of Lawrence Expressway and Benton Street and the project would have a **significant and unavoidable** impact.

5.2 GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires that an EIR evaluate the growth-inducing impacts of a proposed project. A growth-inducing impact is defined by the CEQA Guidelines as:

The way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth.

A project can have direct and/or indirect growth inducement potential. For example, direct growth inducement potential would result if a project involved construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities or if it involved a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand (*Napa Citizens for Honest Government v. Napa County Board of Supervisors*). Similarly, a project would indirectly induce growth if it removed an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply in an area where water service historically limited growth could be considered growth-inducing.

The CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of a project. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and

5.0 OTHER CEQA ANALYSIS

water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is not consistent with, or accommodated by, the land use plans and growth management plans and policies for the area affected. Local land use plans establish land use development patterns and provide growth policies that allow the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

GROWTH EFFECTS OF THE PROJECT

Direct Growth Effects

The project proposes to renovate and operate a private school in the existing buildings on the project site. The project would not result in the development of any new housing. Therefore, the project would not result in any direct growth effects in Sunnyvale.

Indirect Growth Effects

The project site currently contains vacant buildings, which were previously used for an assortment of community uses. Therefore, operation of the school facility would create new employment opportunities including teacher, administrative, and support staff positions. However, an elementary or middle school would not be considered a substantial new employment center and the employment opportunities created by the project would likely be filled by existing area residents. Further, the proposed renovation activities would not require a substantial number of workers and would be completed within 5 months.

The project does not propose the construction of any new roadways or other infrastructure that could support substantial growth elsewhere in the city. Thus, the opening of a new school campus would not remove such any obstacles to growth. Further, per the joint use agreement, the school must enroll a minimum of 51 percent Sunnyvale residents, thus drawing from the existing school-age children in the city. Although the school may motivate some inward migration into Sunnyvale, this would be negligible and would be accommodated by the growth projected in the City's General Plan. Therefore, the project would not indirectly induce substantial growth in the city.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes in the following manner:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Renovation of the existing facility on the project site would irretrievably commit building materials and energy to the repair, improvement, and maintenance of buildings and

infrastructure. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the proposed renovation would include but are not limited to oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. In addition, renewed operation of the school facility would result in an increased demand on public services and utilities (see Section 3.11, Public Services, and Section 3.12, Utilities).

The renovated facility would be required by law to comply with California Building Code Title 24 and would not be expected to use energy or any other resources in a wasteful manner. On the contrary, the project proposes to upgrade windows, doors, walls, landscaping irrigation systems, plumbing, and bathroom fixtures, which would significantly increase the energy and water efficiency of the buildings.

6.0 REPORT PREPARERS

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7.0 REFERENCES

3.1 AESTHETICS

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